

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

MyWebGrocer, Inc.)	
)	
Plaintiff/Counterclaim Defendant)	
)	
v.)	Civil Action No. 5:16-cv-00310-gwc
)	
Adlife Marketing &)	
Communications Co., Inc..)	
)	
Defendant/Counterclaim Plaintiff)	

PROPOSED AMENDMENTS TO STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following proposed amendments to the Stipulated Discovery Schedule/Order pursuant to Local Rule 26(a):

- Depositions of all non-expert witnesses shall be completed by **August 17, 2018**.
- Parties shall submit expert witness disclosures and reports on issues for which they bear the burden of proof, if any, by **August 24, 2018**. Any responsive expert disclosures and reports shall be submitted by **October 1, 2018**. Depositions of expert witnesses shall be completed by **November 2, 2018**.
- All discovery shall be completed by **November 2, 2018**.
- Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before **December 17, 2018**.
- This case shall be ready for trial by **February 15, 2019**.

WHEREFORE, the parties respectfully request that the Court GRANT their proposed amendments to the Stipulated Discovery Schedule/Order.

April 17, 2018

/s/ Cathleen E. Stadecker
/s/ Matthew S. Borick
Counsel for Plaintiff(s)

April 17, 2018

/s/ Gregory P. Howard
/s/ Mathew K. Higbee
Counsel for Defendant(s)

APPROVED and SO ORDERED:

U.S. District/Magistrate Judge

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2018, I filed the foregoing document with the Clerk of Court via the CM/ECF system, which will provide notice of such filing to the following NEF counsel:

Gregory P. Howard, Esq., ghoward@docatty.com, jnn@docatty.com

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/s/ Matthew S. Borick
Matthew S. Borick

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